Nanette S. Edwards, Executive Director



Office of Regulatory Staff 1401 Main Street Suite 900 Columbia, SC 29201 (803) 737-0800 ORS.SC.GOV

ANDREW M. BATEMAN Deputy Chief Counsel for ORS

November 8, 2019

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

Re: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Duke Energy Progress, LLC's and Duke Energy Carolinas, LLC's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended) – S.C. Code Ann. Section 58-41-20(A)

Docket Nos. 2019-185-E and 2019-186-E

Dear Ms. Boyd:

Please find enclosed a Proposed Order submitted on behalf of the South Carolina Office of Regulatory Staff ("ORS"). Please note that the Proposed Order is not comprehensive, but rather only contains an analysis on three issues: the economic life of a Combustion Turbine Unit; seasonal allocation factors; and the Solar Integration Service Charge.

We have, by separate e-mail, sent a copy of the Word version of this Proposed Order to Joseph Melchers.

Sincerely,

Andrew M. Bateman

Encl.

cc: All Parties of Record (via E-Mail)

Joseph Melchers, Esquire (via E-Mail)